



FALCON
RAPPAPORT &
BERKMAN_{LLP}

May 17, 2024

VIA ECF

Hon. Arun Subramanian
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Go Global Retail LLC v. Dream on Me Industries, Inc, et al.*, Index No. 1:23-cv-07987

Dear Judge Subramanian:

This firm represents Plaintiff Go Global Retail LLC in the above referenced action. Together with Defendants, Dream on Me Industries, Inc. and Dream on Me, Inc. (collectively “DOM”), we write to request an extension of the deadlines for: (1) joinder of additional parties, and (2) to amend the pleadings without leave of court. Both deadlines are presently set for May 17, 2024.¹ See ECF No. 20. We respectfully request that both deadlines be extended to **August 2, 2024.**

This is the first request for an extension of these deadlines. We request an extension because fact discovery has just started in earnest and remains ongoing, and the parties require discovery to determine whether additional parties should be joined. Counsel has met and conferred and both parties have consented to this extension. There is presently no scheduled appearance before the Court.

We thank Your Honor for your attention to this matter.

Respectfully submitted,

Falcon Rappaport & Berkman LLP

/s/ Moish E. Peltz

By: Moish E. Peltz, Esq.

Steven C. Berlowitz, Esq.

cc: All Counsel via ECF

¹ Pursuant to Your Honor’s Individual Practices, Rule 3.E, the Parties are required to submit any request for extension or adjournment at least two business days prior to the deadline. Plaintiff respectfully apologizes for the late request for extension. Counsel was unable to coordinate a time to meet and confer far enough in advance of submitting this request.